

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Newark Vicinage**

Caption in Compliance with D.N.J. LBR 9004-1(b)

Ralph A. Ferro, Jr., Esq. (RF-2229)
Law Offices
66 East Main Street, 3rd Floor
Little Falls, NJ 07424
(973) 200-0988
Pro Se Creditor

| | | |
|--------------------|---|--------------------------------|
| In Re: |) | Case No.: 23-13799 (SLM) |
| |) | |
| AYSHA KHAN |) | Chapter: 13 |
| AYYAZ AHMED |) | |
| |) | Judge: Stacey L. Meisel |
| Debtors |) | |
| |) | Hearing Date: 7-12-23 at 10 am |

OBJECTION TO MOTION TO VACATE DISMISSAL

Ralph A. Ferro, Jr., Esq. pro se creditor, by way of objection to the Debtors' Motion to Vacate Dismissal respectfully objects as follows:

1. Debtors have more than \$2,700,000.00 in secured and/or unsecured debt and, as such, are not eligible to be Debtors under this Chapter of the Bankruptcy Code pursuant to 11 U.S.C. 109(e).
2. Both Debtors have filed previous cases, 23-11779 and 22-17986, both of which were pending in the 180 days prior to the filing of this case and, as such, are not eligible to be Debtors under this Chapter of the Bankruptcy Code pursuant to 11 U.S.C. 109(g)(2).
3. The petition and plan filed by Debtors were filed in bad faith as they do not have disposable income for any distribution for unsecured creditors.
4. Debtors have not obtained credit counseling certificates as set forth in 11 U.S.C. 109(h) and thus are not eligible to be Debtors under this Chapter of the Bankruptcy Code.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: July 2, 2023

/s/Ralph A. Ferro, Jr.
Ralph A. Ferro, Jr., Esq.
Pro se Creditor